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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
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13 INTEL CORPORATION and APPLE INC.,

14 Plaintiffs,

15 v.

16 FORTRESS INVESTMENT GROUP LLC,
17 FORTRESS CREDIT CO. LLC, UNILOC
18 2017 LLC, UNILOC USA, INC., UNILOC
19 LUXEMBOURG S.A.R.L., VLSI
20 TECHNOLOGY LLC, INVT SPE LLC,
21 INVENTERGY GLOBAL, INC., and IXI IP,
22 LLC,

23 Defendants.
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Case No. 3:19-cv-07651-EMC

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINES TO
RESPOND TO THE SECOND AMENDED
COMPLAINT AND SET BRIEFING
SCHEDULE ON RESPONSIVE MOTIONS**

Pursuant to Civil Local Rules 6-1 and 6-2, plaintiffs Intel Corporation and Apple Inc. (collectively, "Plaintiffs") and defendants Fortress Investment Group LLC, Fortress Credit Co. LLC, Uniloc 2017 LLC, Uniloc USA, Inc., Uniloc Luxembourg S.A.R.L., VLSI Technology LLC, Inventergy Global, Inc., INVT SPE LLC, and IXI IP, LLC (collectively, "Defendants") by and through their undersigned counsel hereby stipulate to extend Defendants' deadline to respond to Plaintiffs' Second Amended Complaint ("SAC") by 35 days and to set a briefing schedule.

WHEREAS, on January 6, 2021, the Court entered an Order dismissing the amended complaint ("Order") with leave to amend. Dkt. No. 230;

WHEREAS, Plaintiffs filed their second amended complaint ("SAC") on March 8, 2021. Dkt. No. 236;

WHEREAS, Defendants' current deadline to respond to the SAC is March 22, 2021. Fed. R. Civ. P. 15(a)(3);

WHEREAS, the parties have met and conferred over a stipulation to extend Defendants' deadlines to respond to the SAC;

WHEREAS, Defendants anticipate that they may respond to the SAC by way of motions to dismiss and strike, and the parties have agreed on a briefing schedule that will govern such motion practice, subject to the Court's approval;

WHEREAS, neither the parties' proposed extension of Defendants' deadlines to respond to the SAC nor the proposed briefing schedule set forth below will change or alter the date of any event or deadline already fixed by Court order;

IT IS HEREBY STIPULATED AND AGREED by and between the parties, subject to the Court's approval:

1. Defendants' deadlines to answer or otherwise respond to Plaintiffs' SAC are extended through and including April 26, 2021;
2. If Defendants respond by way of motion practice, Plaintiffs may oppose by June 14, 2021 and Defendants may reply by July 8, 2021.

1 IT IS SO STIPULATED.

2 Dated: March 15, 2021

Respectfully submitted,

4 By: /s/ A. Matthew Ashley

5 A. Matthew Ashley
6 *Counsel for Defendants*
7 FORTRESS INVESTMENT GROUP
8 LLC, FORTRESS CREDIT CO. LLC,
9 VLSI TECHNOLOGY LLC

8 /s/ Christopher A. Seidl

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By: /s/ Mark D. Selwyn

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UNILOC USA, INC

ORDER

Pursuant to stipulation, IT IS SO ORDERED.

DATED: _____

The Honorable Edward M. Chen
United States District Judge

ECF ATTESTATION

I, Michael D. Harbour, am the ECF user whose ID and password are being used to file this STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINES TO RESPOND TO THE FIRST AMENDED COMPLAINT AND SET BRIEFING SCHEDULE ON RESPONSIVE MOTIONS. I hereby attest that I received authorization to insert the signatures indicated by a conformed signature (/s/) within this e-filed document.

By: /s/ Michael D. Harbour
Michael D. Harbour